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13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,) No. CR 10-00364 SBA
17 v.) Information Filed April 30, 2010
18 RAYMOND MARK DAVOUDI, and)
19 BAHAREH NOSRATI SHAMLOU) (Oakland Venue)
20 Defendants.)

21 UNITED STATES OF AMERICA,) No. CR 10-00395 PJH
22 v.) Indictment Filed May 13, 2010
23 JAMES DELBERT MCCONVILLE, et al.) (Oakland Venue)

24 Defendants.) **NOTICE OF RELATED CASE
25 IN A CRIMINAL ACTION**
26)

27 The United States of America, pursuant to Local Criminal Rule 8-1, hereby notifies the Court
28 that the two above-captioned criminal cases are related. The single-count information in Case

NOTICE OF RELATED CASES
U.S. v. BRUCE EDWARD ATKINS

1 No. CR 10-00364 SBA, filed on April 30, 2010, involves the same conspiracy alleged in more
2 detail in Count One of the Indictment filed on May 13, 2010 in Case No. CR 10-00395 PJH.
3 Both the Information and the Indictment allege a conspiracy to commit mail and wire fraud in
4 violation of 18 U.S.C. § 1349. Moreover, the Indictment describes the roles that Defendant
5 Davoudi and Defendant Shamlou played in that conspiracy related to fraudulent mortgage
6 applications in the names of straw buyers for the purchase of condominiums in California. The
7 Indictment alleges that both Defendant Davoudi and Defendant Shamlou “regularly used money
8 provided by McConville to obtain cashier’s checks falsely showing the Straw Buyer as the
9 remittur to hide from the lender the true source of money for the down payment into escrow.”
10 The Indictment further alleges that Defendant Davoudi and Defendant Shamlou “regularly
11 caused to be transmitted to lenders loan applications that contained false information about the
12 price of the real property, the income of the Straw Buyer, and the source of money for the down
13 payment.” Based upon these facts, the cases are related within the meaning of Local Rule 8-
14 1(b)(1), because they concern many of the same alleged events, occurrences, transactions, and
15 property. Furthermore, the cases are related within the meaning of Local Rule 8-1(b)(2) because,
16 if heard by separate Judges, they would likely involve substantial duplication of labor, conflicts,
17 and unnecessary expenses.

18 Per the requirement of Local Criminal Rule 8-1(c)(4), government counsel states that
19 assignment of these cases to a single Judge is likely to conserve judicial resources and promote
20 an efficient determination of each action. For the reasons stated above, it is respectfully
21 requested that the matters be related before the Honorable Judge Armstrong.

23 Date: May 19, 2010 Respectfully Submitted,
24 JOSEPH P. RUSSONIELLO

26 _____/s/
27 KESLIE STEWART
Assistant United States Attorney